

REMARKS

Applicant expresses appreciation to the Examiner for the courtesy of an interview granted to applicant's representative Marc A. Berger (Reg. No. 44,029). The interview was held by telephone on Wednesday, September 7, 2005. Applicant is filing the present amendment after final, as discussed with the Examiner during the interview.

Applicant has carefully studied the outstanding Office Action. The present amendment is intended to place the application in condition for allowance and is believed to overcome all of the objections and rejections made by the Examiner. Favorable reconsideration and allowance of the application are respectfully requested.

No claim amendments have been made. Claims 1 - 12, 14 - 18, 22 - 37, 39 - 43, 47 - 58, 60 - 63, 67 - 79, 81 - 84, 88 - 92, 115 - 132, 141 and 142 - 175 are presented for examination.

On page 4 of the Office Action, in Paragraphs I and II, the Examiner has rejected claims 141, 142 and 174 under 35 U.S.C. §102(e) as being fully anticipated by Bloomberg, US Patent No. 5,761,686 ("Bloomberg").

On pages 5 - 21 of the Office Action, in Paragraphs III and IV, the Examiner has rejected claims 1 - 3, 5 - 12, 14 - 18, 22 - 28, 30 - 37, 39 - 43, 47 - 53, 55 - 58, 60 - 63, 67 - 74, 76 - 79, 81 - 84, 88 - 92, 143 - 172 and 175 under 35 U.S.C. §103(a) as being unpatentable over Howard et al., US Patent Application Publication 2001/0042045 ("Howard") and further in view of Bloomberg.

On page 21 of the Office Action, in Paragraph V, the Examiner has rejected claims 4, 29, 54 and 75 under 35 U.S.C. §103(a) as being unpatentable over Howard and further in view of the definition of XML.

On pages 21 - 23 of the Office Action, in Paragraph VI, the Examiner has rejected claims 115 - 117, 121, 124 - 126 and 130 under 35 U.S.C. §103(a) as being unpatentable over Bloomberg.

On pages 23 - 26 of the Office Action, in Paragraph VII, the Examiner has rejected claims 118 - 120, 122, 123, 127 - 129, 131 and 132 under 35 U.S.C. §103(a) as being unpatentable over Bloomberg and further in view of Howard.

On pages 2 - 4 of the Office Action, the Examiner has responded to applicants' previous arguments distinguishing the present invention over Howard and Bloomberg. The Examiner's position is that the rectangular blocks of Bloomberg are analogous to the encrypted text of the present invention, and that Bloomberg teaches determining a layout for the rectangular blocks based on the decrypted text, namely the original text.

Referring to independent method claim 1 above and following the Examiner's analogy, the page with the original text corresponds to input text image 10 of Bloomberg's FIG. 2; and the modified page with the portion of encrypted text, corresponds to iconic image 20 of Bloomberg's FIG. 2. The layout of the rectangular blocks of Bloomberg is determined at step 240 or step 270 of Bloomberg's FIG. 1, and is described at col. 12, line 40 – col. 13, lines 21 and in FIGS. 11 - 16.

It is thus clear that Bloomberg's layout step is performed as part of the generation of the iconic image, and not as part of the rendering of the iconic image. In fact, the rendering of Bloomberg's iconic image requires no special processing at all, and in particular no layout determination, as is clear in Bloomberg's FIGS. 5 – 7 in which the iconic image is simply rendered "as is."

In distinction, the present invention performs layout determination as part of the rendering of the modified page. The present invention does not render the modified page "as is", but instead renders it as a decrypted page. As such, Bloomberg's layout processing is performed at the time of generating the iconic image and not at the time of rendering the iconic image, whereas the present invention performs layout processing at the time of rendering the modified page (which corresponds to Bloomberg's iconic image) and not at the time of generating the modified page. This is clear in claim 1 since the limitation of "*controlling a display layout*" is part of the overall limitation of "*rendering*". Pictorially, referring to FIG. 7 of the present invention, Bloomberg performs layout processing in what corresponds to the top left portion of FIG. 7, namely, while generating the encrypted content; whereas the present invention performs layout processing in the bottom right portion of FIG. 7, namely, while rendering the encrypted content.

The same argument applies to independent method claim 51 above, in which the limitation of controlling a page layout is also part of the overall limitation of rendering the page.

Similarly, regarding independent system claims 26 and 72, in distinction to Bloomberg, the page formatter of the present invention is part of the overall page renderer. Pictorially, referring to FIG. 6 of the present specification, Bloomberg performs layout processing in what corresponds to the top portion of FIG. 6, namely, while generating the encrypted content; whereas the present invention performs layout processing in the bottom portion of FIG. 6, namely, while rendering the encrypted content.

Regarding independent method claim 115 and corresponding independent system claim 124, and following the Examiner's analogy on page 22 of the Office Action, the "*first portion of text*" corresponds to Bloomberg's rectangular blocks in iconic image 20 of Bloomberg's FIG. 2, and the "*second*

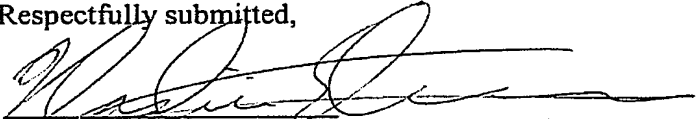
portion of text" corresponds to Bloomberg's text image 10 of Bloomberg's FIG. 2. As such, the limitation of replacing the first portion of text with the second portion of text while rendering the page would correspond to replacing Bloomberg's rectangular blocks with original text – which is not disclosed in Bloomberg.

Again, as above, the difference between Bloomberg's disclosure and the claimed invention is that Bloomberg displays the iconic image "as is", whereas the present invention does not display the encrypted text "as is" (which would correspond to FIG. 1A of the present specification). This is where the analogy of Bloomberg's iconic image with the encrypted text of the present invention breaks down.

For the same reason, independent method claim 141 and independent system claim 142, which including the limitation of *"replacing a first portion of text with a second portion of text when rendering the page"*, are not described in Bloomberg, since Bloomberg renders the iconic image "as is".

For the foregoing reasons, applicant respectfully submits that the applicable objections and rejections have been overcome and that the claims are in condition for allowance.

Respectfully submitted,



Vladimir Sherman
Attorney for Applicant(s)
Registration No. 43,116

Dated: September 8, 2005

Eitan Law Group
C/O Landon IP, Inc.
1700 Diagonal Road, Suite 450
Alexandria, Virginia 22314 USA
Tel/Fax: (212)658-9933